

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Carrie Teager,

Plaintiff,

v.

Green Tree Loan Servicing, LLC
c/o CT Corporation Service
208 S. LaSalle Street, Suite 814
Chicago, IL 60604,

Defendant.

Case No.

COMPLAINT

Jury Demand Requested

JURISDICTION AND VENUE

- 1- This court has jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. §1692k(d).
- 2- Venue is proper because a substantial part of the events giving rise to this claim occurred in this District.

PARTIES

- 3- Plaintiffs are residents of the State of Illinois.
- 4- Plaintiffs incurred an obligation to pay money, the primary purpose of which was for personal, family, or household uses (the "Debt").
- 5- Defendant is a corporation with its principal place of business in the State of Delaware.
- 6- Defendant acquired the Debt after default and is, therefore, subject to the FDCPA.
- 7- Defendant uses instruments of interstate commerce for its principal purpose of business, which is the collection of debts.
- 8- Defendant regularly attempts to collect, or attempts to collect, debts owed or due another.
- 9- At all times relevant, Defendant owned the Debt or was retained to collect the Debt.

FACTS COMMON TO ALL COUNTS

- 10- On or around June 14, 2014, Defendant telephoned Plaintiff to collect the Debt.
- 11- During this telephone call, Defendant failed to identify itself as a debt collector as required by the FDCPA.
- 12- Upon information and belief, Defendant telephoned Plaintiff several more times and failed to identify itself as a debt collector.
- 13- Upon information and belief, Defendant does not have reasonable procedures in place to ensure that Defendant and its agents identify themselves as debt collectors in compliance with the FDCPA.
- 14- Defendant damaged Plaintiff.
- 15- Defendant violated the FDCPA.

COUNT I

- 16- Plaintiffs incorporate all the allegations and statements made above as if reiterated herein.
- 17- Defendant violated 15 USC § 1692g by failing to identify itself as a debt collector during communications with a consumer.

COUNT II

- 18- Plaintiffs incorporate all the allegations and statements made above as if reiterated herein.
- 19- Defendant violated 15 USC § 1692f by engaging in unfair and unconscionable practices to collect a debt.

JURY DEMAND

- 20- Plaintiffs demand a trial by jury.

PRAYER FOR RELIEF

- 21- Plaintiffs pray for the following relief:

- a. Judgment against Defendant for Plaintiffs' actual damages, as determined at trial, suffered as a direct and proximate result Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(1);
- b. Judgment against Defendant for \$2,000 in statutory damages (\$1,000 for each plaintiff) for Defendant's violations of the Fair Debt Collection Practices Act, pursuant to 15 U.S.C. §1692k(a)(2)(A);
- c. Judgment against Defendant for Plaintiffs' reasonable attorneys' fees and costs incurred in this action, pursuant to 15 U.S.C. §1692k(a)(3); and
- d. Any other legal and/or equitable relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED,

Meier LLC

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